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November 4, 2003

***Via Electronic Mail Delivery***

Mr. William Maher, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Mr. John Muleta, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re:   *Written Ex Parte Communication***  
***Wireless Local Number Portability Implementation***  
***CC Docket No. 95-116***

Gentlemen:

Sprint Corporation below responds to certain representations made recently by CenturyTel to the Wireline Competition Bureau concerning the impact of porting telephone numbers between CenturyTel and wireless carriers.<sup>1</sup> As discussed below, Sprint challenges a number of the comments made by CenturyTel in its meeting.<sup>2</sup>

*CenturyTel Claim:* The *bona fide* requests (“BFRs”) Sprint PCS submitted to CenturyTel “fail to comply with current FCC rules and regulations and are therefore invalid.”<sup>3</sup>

*Response:* The BFRs that Sprint has submitted to CenturyTel are valid. The Commission has ruled that a valid BFR must contain three components:

Requesting telecommunications carriers must [1] specifically request portability, [2] identify the discrete geographic area covered by the request, and [3] provide a tentative date by which the carrier expects to utilize number portability to port prospective customers.<sup>4</sup>

<sup>1</sup> See Letter from Gerard Duffy, Blooston, Mordkofsky, Dickens, Duffy & Prendergast, to Marlene H. Dortch, FCC Secretary, CC Docket No. 95-116 (Oct. 20, 2003) (“CenturyTel Letter”).

<sup>2</sup> Sprint will not respond to CenturyTel’s allegation that NeuStar is not performing proper “verification” before assigning thousands blocks. See *id.* at 2 and Attachment at A-6 to A-7.

<sup>3</sup> CenturyTel Attachment at A-1.

<sup>4</sup> *Fourth LNP Order*, CC Docket No. 95-116, FCC 03-126, at ¶ 10 (June 18, 2003).

Attachment 1 is a copy of the BFR that Sprint submitted to CenturyTel in Oregon. A review of this document demonstrates that this BFR satisfies all three conditions. Sprint specifically requested LNP; it identified the discrete geographic areas covered by the request by identifying the CenturyTel switches it wished be made LNP capable; and it asked CenturyTel to provide LNP effective by a firm date, November 24, 2003. In this regard, the FCC has recently ruled that, in the wireless-wireless porting context, "Sprint's profile information exchange process is an example of the type of contact and technical information that would trigger an obligation to port."<sup>5</sup>

CenturyTel advances three reasons why it thinks Sprint's BFRs are invalid, but Sprint respectfully submits that none of these reasons has merit.

1. Sprint has not made a "specific request" of CenturyTel. CenturyTel asserts that the BFRs submitted by "many" wireless carriers "make no reference to any specific switches or list every switch in the MSA regardless of the ILEC owner."<sup>6</sup> While Sprint is not familiar with the BFRs submitted by other carriers, this criticism does not apply to Sprint's BFRs. As Attachment 1 documents, Sprint identified with precision the CenturyTel switches that it seeks LNP by referencing each switch's CLI code. Moreover, Sprint targeted its request by seeking LNP in only 37 of the 52 switches that CenturyTel operates in Oregon.

2. A BFR is valid only after "an interconnection agreement or a request for an agreement is in place."<sup>7</sup> The Commission has already rejected the argument that ILECs can postpone, or avoid, the obligations imposed on them in Section 251(b) of the Act pending the negotiation or arbitration of an interconnection agreement.<sup>8</sup> If carriers exchange traffic without an interconnection contract before LNP, such a contract does not suddenly become necessary once LNP becomes available. Interconnection contracts were not necessary when carriers began pooling numbers, and they are still not necessary when carriers between porting numbers.<sup>9</sup> In addition, the Commission has rejected this argument in the context of porting between wireless carriers:

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<sup>5</sup> *Local Number Portability*, CC Docket No. 95-116, *Memorandum Opinion and Order*, FCC 03-237, at 8 n.40 (Oct. 7, 2003) ("Wireless Porting Order"). While the FCC made this ruling in the context of porting between wireless carriers, rather than LEC-wireless porting, Sprint submits that it cannot fairly be argued that a LNP request format that is valid for wireless carriers is invalid when submitted instead to landline carriers. The technology a carrier uses in the provision of its services should have no bearing on the type of information required to trigger an LNP obligation.

<sup>6</sup> CenturyTel Attachment at A-1.

<sup>7</sup> CenturyTel Attachment at A-1.

<sup>8</sup> See *TSR Wireless v. US WEST*, 15 FCC Rcd 11166, 11182-83 ¶¶ 27-29 (2000), *aff'd* *Qwest v. FCC*, 252 F.3d 462 (D.C. Cir. 2001).

<sup>9</sup> CenturyTel is mistaken in asserting that interconnection contracts are required when two carriers indirectly indirectly via a LATA tandem switch. See CenturyTel Attachment at A-2 n.2. Sprint PCS interconnects indirectly today with hundreds of carriers with which it does not have an interconnection contract.

[A]ny agreements establishing terms for interconnection are also not required between wireless carriers. Of course, nothing would prevent carriers from entering into interconnection agreements on a voluntary basis; however, no carrier may unilaterally refuse to port with another carrier because that carrier will not enter into an interconnection agreement.<sup>10</sup>

Sprint recognizes that the Commission made this ruling in the context of porting between wireless carriers, rather than LEC-wireless porting, and did not apply it to LEC-wireless porting. But, it cannot be reasonably argued that whether a carrier uses wired or wireless technology in the “last mile” of its services has any bearing on whether an interconnection contract with other carriers is required or not.

3. Sprint is asking CenturyTel to provide “location porting”<sup>11</sup> This is not accurate. The Act defines number portability as the ability of customers to retain “at the same location, existing telecommunications numbers . . . when switching from one telecommunications carrier to another.”<sup>12</sup> If Sprint provides its wireless services at a location where a CenturyTel customer receives his or her services, that CenturyTel customer has a right under the statute to port his or her number.<sup>13</sup> Indeed, the FCC has already ruled that LEC-to-wireless porting is service provider portability:

LECs are obligated under the statute to provide number portability to customers seeking to switch to CMRS carriers.<sup>14</sup>

CenturyTel further asserts that LEC-wireless porting is “limited to the rate center geographic restriction.”<sup>15</sup> Sprint (and other wireless carriers) are not asking LECs to port their customers’ numbers “across” their rate centers. Sprint is simply asking that CenturyTel provide number portability as defined in the statute – that is, permit its customers to port to Sprint when Sprint provides its services “at the same location” where the Cen-

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The prevailing industry practice, where two carriers interconnect indirectly and exchange small volumes to traffic, is to operate *without* an interconnection contract and pursuant to a bill-and-keep arrangement.

<sup>10</sup> *Wireless Porting Order* at ¶ 21.

<sup>11</sup> CenturyTel Attachment at A-2.

<sup>12</sup> 47 U.S.C. § 153(30).

<sup>13</sup> Of course, the CenturyTel customer would have no interest in changing to Sprint’s services if Sprint did not provide coverage at the location where the CenturyTel customer receives his Century services.

<sup>14</sup> *First LNP Order*, 11 FCC Rcd 8352, 8357 ¶ 8 (1996). *See also id.* at 8443 ¶ 172 (“We regard switching among wireline service providers and broadband CMRS providers, or among broadband CMRS providers, as changing service providers” and thus falling within the definition of service provider portability.); Letter from John B. Muleta, Chief, WTB, to John T. Scott, Verizon Wireless, CC Docket No. 95-156, DA 03-2190, at 3 (July 3, 2003)(“The Commission’s rules require porting between wireless and wireline carriers.”).

<sup>15</sup> CenturyTel Attachment at A-2.

CenturyTel customer receives his CenturyTel services. A CenturyTel customer number that is ported to Sprint will remain associated with, or rated to, the same CenturyTel rate center. This provides further evidence that wireless carriers are not, as CenturyTel asserts, asking LECs to provide location portability (as opposed to service provider portability).

CenturyTel Claim: LNP will be “burdensome to consumers.”<sup>16</sup>

Response: The simple response is that Congress determined to impose on “each local exchange carrier” the “duty” to provide LNP –without regard to the costs of implementing LNP. In addition, the facts that CenturyTel recites do not support its sweeping statement that LNP would be “burdensome to consumers.” CenturyTel asserts that providing LNP ubiquitously throughout its network would require it to invest \$10 million.<sup>17</sup> But CenturyTel serves 1.8 million access lines,<sup>18</sup> so a \$10 million investment is the equivalent of \$5.65 per access line.<sup>19</sup>

CenturyTel further states that under the FCC’s LNP cost recovery program, its residential customers would pay somewhere between \$0.32 to \$0.89 monthly.<sup>20</sup> However, CenturyTel provides no factual support for this estimate. Nor does it disclose the amortization period it used for this estimate (e.g., whether one year, three years or five years). Sprint’s local telephone company division charges its customers a monthly LNP surcharge of \$0.48.

CenturyTel Claim: The FCC should commence a new rulemaking proceeding because LEC-wireless porting “would affect currently billed access revenues.”<sup>21</sup>

Response: LEC-wireless porting will not change the way in which CenturyTel rates its customers’ calls as local or toll, as Sprint has repeatedly explained.<sup>22</sup> Thus, if a call to a number is local today, it will remain local after that number is ported. Similarly, if a call to a number is a toll call today, it will remain a toll call after the number is ported. Consequently, LNP will have no effect on CenturyTel’s “billed access revenues.” There is no reason for the Commission to commence a new rulemaking proceeding to address “inter-carrier compensation issues as a result of LNP.”<sup>23</sup> The Commission intercarrier compen-

<sup>16</sup> CenturyTel Attachment at A-2.

<sup>17</sup> See *id.*

<sup>18</sup> See Industry Analysis and Technology Division, *Trends in Telephone Service*, at 7-5, Table 7.3 (Aug. 2003).

<sup>19</sup> See, e.g., *Brunson Communications Waiver Denial Order*, 16 FCC Rcd 21499 (2001)(compliance costs of \$4.19 per customer do not justify a rule waiver).

<sup>20</sup> See CenturyTel Attachment at A-2.

<sup>21</sup> CenturyTel Attachment at A-3.

<sup>22</sup> See, e.g., Letter from Luisa Lancetti, Sprint, to William Maher, Chief WCB, and John Muleta, Chief WTB, CC Docket No. 95-116, at 1-2 (Oct. 21, 2003).

<sup>23</sup> See CenturyTel Attachment at A-3.

sation rules are the same, whether a CenturyTel customer calls a wireless customer with a ported number or a non-ported number.

CenturyTel Claim: If CenturyTel is excused from providing LEC-wireless porting and if wireless carriers interconnect directly rather than indirectly, CenturyTel will be unable to route calls to the correct wireless carrier, with the result that calls made by its customers will "drop."<sup>24</sup>

Response. Calls will not drop as CenturyTel asserts. Moreover, CenturyTel's two assumptions are not valid.

1. CenturyTel's Assumption: Sprint's BFRs are invalid. According to CenturyTel, the alleged problem of dropped calls will occur "until such time that CenturyTel is required to provide LNP."<sup>25</sup> CenturyTel assumes that it can be excused from providing LNP because Sprint's *bona fide* requests are "not . . . valid."<sup>26</sup> Sprint demonstrates above that its BFRs are valid. There is, therefore, no basis to CenturyTel's argument that its customers' calls to wireless carriers will be dropped because it is not LNP capable.

2. CenturyTel's Assumption: Wireless carriers must directly interconnect with CenturyTel. CenturyTel argues that wireless carriers should "not be allowed to use this [LNP] situation to declare that indirectly trunking should be the preferred method for exchanging traffic with an RLEC."<sup>27</sup> However, since the inception of the wireless industry 20 years ago, wireless carriers have utilized Type 2A interconnection, whereby they connect directly to the LATA tandem switch and thus connect *indirectly* with other networks that subtend the tandem switch, including RLEC networks. There is no requirement in existing FCC rules that wireless carriers must directly interconnect with RLECs before RLECs must begin providing LNP. To the contrary, the Commission declared over six years ago:

Moreover, to provide number portability, carriers can interconnect either directly *or indirectly* as required under Section 251(a)(1).<sup>28</sup>

Indeed, the Commission held earlier this month in the context of porting between wireless carriers that direct interconnection is not a condition precedent to LNP:

Nothing in the rules provides that wireless carriers must port numbers only in cases where the requesting carrier has numbering resources and/or a direct interconnection in the rate center associated with the number to

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<sup>24</sup> CenturyTel Letter at 1 and Attachment at A-4 to A-5.

<sup>25</sup> CenturyTel Attachment at A-4.

<sup>26</sup> *Id.* at A-5 n.6.

<sup>27</sup> *Id.* at A-4 n.4.

<sup>28</sup> *First LNP Reconsideration Order*, 12 FCC Rcd 7236, 7305 ¶ 121 (1997)(emphasis added).

be ported and wireless carriers may not demand that carriers meet these conditions before porting.<sup>29</sup>

Again, Sprint acknowledges that the Commission made this ruling in the context of porting between wireless carriers, and not with regard to LEC-wireless porting. But, also again, it cannot be argued that whether a carrier uses wired or wireless technology in the “last mile” of its services has any bearing on whether carriers should interconnect directly or indirectly with each other.

3. CenturyTel customer calls to wireless carriers will not drop. CenturyTel complains that calls made by RLEC customers to wireless customers with ported numbers will “drop” *if* the RLEC is not LNP capable and *if* the wireless carrier happens to connect directly with the RLEC.<sup>30</sup> CenturyTel acknowledges there is an alternative where RLEC customer calls would not drop: “route all wireline to wireless traffic through a common access tandem.”<sup>31</sup> CenturyTel does not like this alternative because the tandem switch owner would charge it for performing the LNP database dip (a query that CenturyTel cannot perform itself so long as its switch is not LNP capable).<sup>32</sup> CenturyTel complains that it is “not legally able to recover any LNP costs until” it becomes LNP capable.

In fact CenturyTel, or any other non-LNP capable carrier, is capable of recovering the LNP database dip costs that it incurs in correctly routing traffic to customers served by LNP-capable carriers.<sup>33</sup> Indeed, the Commission amended its LNP cost recovery program precisely to cover this situation, where a non-LNP-capable LEC incurs query costs to ensure its customers’ traffic is routed correctly.<sup>34</sup>

Finally, CenturyTel states that wireless LNP is being implemented “for the benefit of wireless competition.”<sup>35</sup> Sprint must respectfully disagree. The Commission has declared that wireless LNP is “necessary to preserve consumer choice and enhance competition among CMRS carriers *and between the wireless and wireline industries.*”<sup>36</sup> The wireless market today is highly

<sup>29</sup> *Wireless Porting Order* at ¶ 21.

<sup>30</sup> CenturyTel Letter at 1 and Attachment at A-4 to A.5.

<sup>31</sup> *Id.* at A-5.

<sup>32</sup> CenturyTel also complains that the tandem switch owner would charge it for its use of the tandem switch. *See ibid.* There is nothing unreasonable in a transit provider recovering its costs for services rendered. While a RLEC would incur new transit carrier costs, the savings of no longer having a facility directly connecting the RLEC network with the wireless carrier network would likely offset those costs.

<sup>33</sup> As CenturyTel acknowledges, the situation it describes is not limited to LEC-wireless porting or wireless-wireless porting, but also applies to LEC-LEC porting. *See id.* at A-4 n.5.

<sup>34</sup> *See* 47 C.F.R. § 52.33(a)(3). *See also Third LNP Reconsideration Order*, 17 FCC Rcd 2578 (2002).

<sup>35</sup> CenturyTel Letter at 2.


<sup>36</sup> *Verizon Wireless LNP Forbearance Denial Order*, 17 FCC Rcd 17972, 14986 ¶ 34 (2002)(emphasis added).

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competitive, with 30 percent of wireless customers changing carriers each year – *even without LNP*.<sup>37</sup> Sprint submits that a primary reason the Commission adopted the wireless LNP rule is to inject into the LEC residential market additional competition. Intermodal competition offers residential customers, and especially RLEC customers, an alternative to ILEC services.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, one copy of this letter is being filed electronically with the Secretary's office for filing in CC Docket No. 95-116.

Respectfully submitted,



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Sprint Corporation  
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202-585-1923

Attachment: Sample Sprint PCS BRF to CenturyTel

cc: Matt Brill	Sheryl Wilkerson
Jennifer Manner	Christopher Libertelli
Sam Feder	Eric Einhorn
Dan Gonzalez	Cheryl Callahan
Scott Bergmann	Jared Carlson
Barry Ohlson	Jennifer Salhus
Jessica Rosenworcel	Pam Slipakoff
Paul Margie	Jennifer Tomchin
Bryan Tramont	Jeffrey Dygert
Sharon Diskin	Debra Weiner
Carol Matthey	Cathy Seidel
David Furth	

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<sup>37</sup> See, e.g., *Eighth CMRS Competition Report*, WT Docket No. 02-379, FCC 03-150, at ¶ 57 (July 26, 2003).

**Bonafide Request Form (BFR)**

**Purpose:** This form is used to request deployment of long-term Local Number Portability as defined in the FCC mandates (CC Docket 95-116). Specifically, this form requests that ALL codes be opened for portability within the Metropolitan Statistical Area and wireline switch CLLI codes designated below. This form may be used for both wireline and wireline requests.

**TO RECIPIENT:**

OCN:

Company Name: CENTURYTEL

Contact Name: CAROLYN JARETT

Contact's Address: 805 BROADWAY

VANCOUVER WA 98660

Contact's Phone: 360-405-8859

**FROM (PRODUSTOR):**

Company Name: Sprint PCS

Contact Name: From Rural

Contact's Address: 6500 Sprint Parkway

Mailing: ESOP/HV2516-SB360

Overland Park, KS 66210

Contact's Email: fromgo1@sprintpcs.com

Contact's Fax: (913) 523-4313

Contact's Phone: (913) 794-4006

**TIMING:**

Date of Request: May 23, 2003

Receipt Confirmation Due By: June 9, 2003

Effective Date: November 24, 2003

**Designated Wireline Switch CLLI Codes:**

1st CLLI: See Attached

2nd CLLI:

3rd CLLI:

4th CLLI:

5th CLLI:

6th CLLI:

**Designated Metropolitan Statistical Areas (MSAs):**

Note: MSAs refer to the U.S. Census Bureau MSAs. These may differ from the MSAs as originally defined by the wireline or wireless industry.  
**MSA NAME:** See Attached

**Actions Required of the Recipient:**

1. Within 10 days of receipt, provide confirmation to the requester that this form has been received.
2. For all currently released codes, and those to be released at any future time, within the designated U.S. Census Bureau MSAs and wireline switch CLLI codes (where applicable), open all for porting within the LERG.
3. For all currently released codes, and those to be released at any future time, within the designated U.S. Census Bureau MSAs and wireline switch CLLI codes (where applicable), open all for porting within the NPAC (Number Portability Administration Center).

4. Ensure that all porting bearing codes within the designated MSAs are Local Number Portability capable.  
 Wednesday, May 07, 2003  
 BFR Checklist Form ver 020204.doc



Centurytel WA

CCN	CCN NAME	CO NAME SPEC	CATEGORY	USA NAME	PORTABLE	SEC	COCTYPE	SWITCH	LOC STATE
2185	CENTURYTEL OF EAGLE, INC.	CENTURYTEL	ICO		N	N	EOC	EAGLOOXCD84	CO
2185	CENTURYTEL OF EAGLE, INC.	CENTURYTEL	ICO		N	N	EOC	GYPSCOXCR80	CO
2185	CENTURYTEL OF EAGLE, INC.	CENTURYTEL	ICO		N	N	EOC	EDWRCCOXCD81	CO
2185	CENTURYTEL OF EAGLE, INC.	CENTURYTEL	ICO		N	N	EOC	EDVRCCOXCD81	CO
2380	TELEPHONE UTILITIES OF EASTERN OREGON, INC.	CENTURYTEL	ICO	Portland-Vancouver, OR-WA	N	N	EOC	GVCMORXAD80	OR
2380	TELEPHONE UTILITIES OF EASTERN OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	ECHOORXAR80	OR
2380	TELEPHONE UTILITIES OF EASTERN OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	BDMNORXAD80	OR
2380	TELEPHONE UTILITIES OF EASTERN OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	SHDORXAR80	OR
2388	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	LBNNORXBD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	LBNNORXBD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	SVTHORXOD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	LBNNORXBD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	BYVLORXAR80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO	Portland-Vancouver, OR-WA	N	N	EOC	SCPPORXAD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO	Salmon, OR	N	N	EOC	ALNRORXAD80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO	Portland-Vancouver, OR-WA	N	N	EOC	CH8UORXAR80	OR
2398	CENTURYTEL OF OREGON, INC.	CENTURYTEL	ICO		N	N	EOC	YNOLORXAD80	OR
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Eugene-Springfield, OR	N	N	EOC	ORVLOXAD80	OR
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Seattle-Bellevue-Everett, WA	N	N	EOC	PLCYWAXCR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Spokane, WA	N	N	EOC	SPNGWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	MYTSWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	SPAGWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Richland-Kennewick-Pasco, WA	N	N	EOC	ELTPWAXCR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Seattle-Bellevue-Everett, WA	N	N	EOC	SNFSWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Seattle-Bellevue-Everett, WA	N	N	EOC	VSHNWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	BLMAWAXAD81	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	MOCLWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	OCSTWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	RTVLWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Seattle-Bellevue-Everett, WA	N	N	EOC	ASTKYWAXAR81	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO		N	N	EOC	RTVLWAXAR80	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Tacoma, WA	N	N	EOC	ORNGWAXAD81	WA
2408	CENTURYTEL OF WASHINGTON, INC.	CENTURYTEL	ICO	Tacoma, WA	N	N	EOC	SPARWAXCR80	WA
2422	CENTURYTEL OF INTER-ISLAND, INC.	CENTURYTEL	ICO		N	N	EOC	FRHRWAXAD81	WA
2422	CENTURYTEL OF INTER-ISLAND, INC.	CENTURYTEL	ICO		N	N	EOC	FRHRWAXAD81	WA
2422	CENTURYTEL OF INTER-ISLAND, INC.	CENTURYTEL	ICO		N	N	EOC	ESNDWAXAR80	WA
2422	CENTURYTEL OF INTER-ISLAND, INC.	CENTURYTEL	ICO		N	N	EOC	FRHRWAXAD81	WA